

REMARKS/ARGUMENTS

The Office Action mailed March 13, 2007 rejected pending claims 1-19 under 35 U.S.C. 103(a) as being unpatentable over Ayers ("AbiWord's Potential"), hereinafter referred to as "Ayers", in view of AbiWord Schema ([www.abisource.com/awml.xsd](http://www.abisource.com/awml.xsd)) hereinafter referred to as "AbiWord Schema." The Applicants respectfully disagree and present the following for consideration. Claims 1-3, 5, 6, 8-10, 12, 13, 15-17 and 19 have been amended. No new matter has been added.

Claim Rejections

Claim 1 is rejected under 35 U.S.C. 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Claims 1-19 were rejected under 35 U.S.C. 103(a) as being unpatentable over Ayers in view of AbiWord Schema. The Applicants respectfully disagree and present the following.

In response to the Office Actions statement that the term non-structured feature is vague, the Applicants have amended the independent claims to define the term more clearly. The term non-structured feature is defined within the Applicants' specification to mean a feature that is allowed to span an arbitrary range. As amended, Claim 1 recites in part "wherein the non-structured feature spans the other tags in the ML document" which is similar to the claim's preamble.

Claim 1 also includes the recitation "empty tag" which means that the tag does not include content. Other tags are included between the start feature tag and the end feature tag.

The Applicants have amended the claims to change start tag to start feature tag and end tag to end feature tag.

In regard to the claim rejections, the Applicants submit the following example from the Applicants' specification in order to help clarify the terms and the claims. The Applicants' specification beginning on page 8, line 15 and ending on page 9, line 10 includes a bookmark example which is considered a non-structured feature. FIGURE 4 shows the bookmark example using a start feature tag that is empty and an end feature tag that is empty to span the bookmark that spans an arbitrary range. The text shown in FIGURE 4 is:

*Here is my first paragraph*  
*Here is my second paragraph*

Using a standard XML tag and applying a bookmark from "first" within the first paragraph to "second" within the second paragraph, the XML would look something like:.

```
<w:p>  
    Here is my  
        <w:bookMark name=""2nd sentence"">  
            First paragraph  
</w:p>  
<w:p>  
            Here is my  
                </w:bookMark>  
            second paragraph  
</w:p>
```

As can be seen, the above example is not well formed, as the bookmark tag overlaps the paragraph tags.

According to the presently claimed invention, to create a well formed XML representation, two tags are used for features that span arbitrary ranges, such as bookmarks. For example, FIGURE 4 shows the text with the start tag that is empty and an end tag that is empty that is used to span a bookmark feature that spans an arbitrary range.

```
<w:p>
    Here is my
        <w:bookmarkStart name="2nd sentence" id="bk1"/>
    first paragraph
</w:p>
<w:p>
    Here is my
        <w:bookmarkEnd id="bk1"/>
    second paragraph
</w:p>
```

As can be seen there are two separate tags that are used to define the bounds of the arbitrary range that is spanned by the bookmark. The cited prior art fails to teach a start feature tag and an end feature tag that span an arbitrary range within the ML document. To this end, the Applicants have attempted to create a bookmark with the latest version of AbiWord (v. 2.4.6) (even though the latest version is not prior art) that spans two paragraphs but were unsuccessful. This is probably due to the fact that creating a bookmark that spans two paragraphs would result in XML that is not well formed. AbiWord (v. 2.4.6) seems to only allow a user to create a bookmark that spans a single paragraph. Claim 1 is proposed to be allowable since the cited art fails to teach the use of a start feature tag and an end feature tag that spans an arbitrary range to represent a non-structured feature. Claims 2-8 are proposed to be allowable as they depend from a valid base claim.

Claim 9 as amended recites in part “determining locations for a start feature tag and an end feature tag; wherein the location of the start feature tag indicates a starting position for a non-structured feature and the location of the end feature tag represents an ending position for the non-structured feature; wherein the non-structured feature spans the other tags in the ML document; and placing the start feature tag and the end feature tag at the determined locations, wherein the start feature tag and the end feature tag are empty tags that span other tags within the ML document while adhering to a well formed ML rule.” Claim 9 is proposed to be allowable for at least the reasons presented above. Claims 10-15 are proposed to be allowable as they depend from a valid base claim.

Claim 16 as amended recites in part “placing a start feature tag and an end feature tag at the determined locations, wherein the start feature tag and the end feature tag are empty tags; wherein the location of the start feature tag indicates a starting position for a non-structured feature and the location of the end feature tag represents an ending position for the non-structured feature; and wherein the start feature tag and the end feature tag span other tags within the ML document while adhering to a well formed ML rule; and wherein the non-structured feature spans the other tags within the ML document.” Claim 16 is proposed to be allowable for at least the reasons presented above. Claims 17-19 are proposed to be allowable as they depend from a valid base claim.

### Conclusion

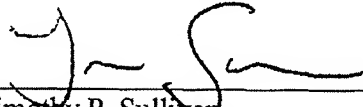
In view of the foregoing amendments and remarks, all pending claims are believed to be allowable and the application is in condition for allowance. Therefore, a Notice of Allowance is respectfully requested. Should the Examiner have any further issues regarding this application,

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the Examiner is requested to contact the undersigned attorney for the applicant at the telephone number provided below.

Respectfully submitted,

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